

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

	)	
	)	
In the Matter of	)	
Comments Concerning the Actions to	)	
Accelerate Adoption and Accessibility of	)	GN Docket No. 16-46
Broadband-Enabled Health Care Solutions and	)	
Advanced Technologies	)	
	)	

**REPLY COMMENTS OF THE WIRELESS INFRASTRUCTURE ASSOCIATION**

The Wireless Infrastructure Association (WIA)<sup>1</sup> respectfully submits these reply comments in the above-captioned proceeding in response to the *Broadband-Enabled Health Care Solutions Public Notice* (PN).<sup>2</sup> WIA supports efforts to promote and improve efficient broadband deployment and commends the Federal Communications Commission (FCC or Commission) for recognizing the importance of accelerating adoption and accessibility of broadband-enabled health care solutions and advanced technologies in mHealth<sup>3</sup> and healthIT.<sup>4</sup>

---

<sup>1</sup> WIA is the principal organization representing companies that build, design, own, and manage telecommunications facilities throughout the world. Its over 230 members include carriers, infrastructure providers, and professional services firms.

<sup>2</sup> *Actions to Accelerate Adoption and Accessibility of Broadband-Enabled Health Care Solutions and Advanced Technologies*, Public Notice, GN Docket No. 16-46, FCC 17-46 (rel. Apr. 24, 2017).

<sup>3</sup> *Id.* at 1 (“While ‘mHealth’ traditionally stands for ‘mobile health,’ the term also has been applied more broadly to refer to mobile health, wireless health, and e-Care technologies that improve patient care and the efficiency of health care delivery.”); see mHealth Task Force Findings and Recommendations, at 1 (Sept. 24, 2012) (*mHealth Task Force Report*), available at <http://transition.fcc.gov/cgb/mhealth/mHealthRecommendations.pdf>.

<sup>4</sup> *Id.* (“The term ‘health IT’ is defined herein as information-driven health practices and the technologies that enable them; it includes billing and scheduling systems, e-care, EHRs, telehealth, and mobile health.”).

WIA joins other commenters in recognizing that streamlining processes so that wireless providers can deploy facilities in a reasonable and timely manner will enable new technologies, such as 5G and the Internet of Things (IoT), to enhance mobile health and other wireless services.<sup>5</sup>

**I. TO PROMOTE ACCESS TO AND ADOPTION OF MOBILE HEALTH SOLUTIONS, THE COMMISSION SHOULD FOCUS ON REMOVING BARRIERS TO WIRELESS INFRASTRUCTURE DEPLOYMENT.**

The Commission should focus its efforts on accelerating broadband deployment by continuing to remove barriers to the siting of wireless broadband infrastructure. By removing barriers to the deployment of infrastructure like distributed antennas systems (DAS) and small cells and encouraging an environment of rapid upgrades and installation of equipment on traditional macrocellular infrastructure through collocation, the FCC can facilitate greater coverage and capacity of wireless broadband networks. WIA commends the Commission for the work it has already done to reduce wireless infrastructure deployment barriers, including adoption of the 2014 Wireless Infrastructure Order<sup>6</sup> and the recent amendments to the Collocation Agreement.<sup>7</sup> The FCC has a tremendous opportunity to continue these streamlining efforts through its *Streamlining Deployment of Small Cell Infrastructure; Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*

---

<sup>5</sup> See, e.g., CTIA Comments at 3; CTA Comments at 1; see also Qualcomm Comments at 5 (“Infrastructure siting policies will play a vital role in ensuring 5G success.”).

<sup>6</sup> *Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies, Report and Order*, 29 FCC Rcd 12865 (2014).

<sup>7</sup> *Wireless Telecommunications Bureau Announces Execution of First Amendment to the Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*, Public Notice, DA 16-900, 81 Fed. Reg. 59146 (2016).

proceedings<sup>8</sup>; and through its recently formed Broadband Deployment Advisory Committee (BDAC) to accelerate the deployment of broadband and reform infrastructure siting policies.<sup>9</sup> WIA encourages the Commission to continue with policies that reduce barriers to wireless infrastructure deployment and streamline wireless infrastructure deployment processes at the FCC, in state and local governments, with Tribes, and on federal lands.<sup>10</sup> By streamlining the process for wireless infrastructure deployment, the Commission can accelerate the adoption and accessibility of broadband-enabled health care solutions.

## **II. STREAMLINING BROADBAND INFRASTRUCTURE SITING WILL ENABLE THE DEPLOYMENT OF NEXT-GENERATION 5G TECHNOLOGIES FOR WIRELESS HEALTH SOLUTIONS.**

Next-generation 5G wireless networks will provide significantly faster speeds, be far more responsive, and support substantially higher device density, enabling greater connectivity for a host of new devices, services, and applications.<sup>11</sup> Machine-to-Machine connections will enable progress in mobile health and improve patient outcomes and quality of life; however, most health applications would require a high bandwidth and low latency connection outside the

---

<sup>8</sup> *Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies and Mobilitie, LLC Petition for Declaratory Ruling*, Public Notice, WT Docket No. 16-421, DA 17-293 (2016); *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, Notice of Proposed Rulemaking and Notice of Inquiry, WT Docket No. 17-79, FCC 17-38 (2017); *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, FCC 17-37 (2017).

<sup>9</sup> Statement of FCC Chairman Pai on the Formation of BDAC (Jan 31, 2017) (“The BDAC’s mission will be to identify regulatory barriers to infrastructure investment and to make recommendations to the Commission on reducing and/or removing them.”); *see also* Qualcomm at 5.

<sup>10</sup> *See, e.g.*, CTA Comments at 7; Qualcomm Comments at 5.

<sup>11</sup> *See, e.g.*, CTIA Comments at 3; Nokia at 4.

capabilities of LTE, hence potential for 5G.<sup>12</sup> High speed wireless networks will allow the transmission of real time information to distant doctors and enable them to make informed decisions when handling emergency situations. Additionally, 5G will enhance the efficiency and effectiveness of the IoT health solutions currently on the market. For example, WIA members report a band-aid sized monitor that tracks seven heart functions and can wirelessly alert the patient and doctor, or call 911, if a heart attack is imminent. Also, industry has created a wireless stethoscope for patients who face a long commute to reach a doctor's office, or require an exam by a specialist located thousands of miles away. Remote patient monitoring using mobile devices is forecast to save the U.S. \$36 billion in healthcare costs by 2018.<sup>13</sup> Furthermore, wireless infrastructure is being deployed within health facilities. WIA's member Advanced RF Technologies, Inc. presented at the FCC's DAS and Small Cell Workshop last year an advanced DAS coverage solution deployed at Memorial Sloan Kettering Cancer Center.<sup>14</sup> The solution is increasing staff productivity and patient-guest communication to aid the center with its cancer research and treatment.

5G and next-generation network technologies will be dependable and rapid, but these benefits cannot be achieved without the deployment of robust wireless infrastructure. WIA encourages the Commission to further policies that reduce barriers to wireless infrastructure

---

<sup>12</sup> DAN WARREN & CALUM DEWAR, GSMA INTELLIGENCE, UNDERSTANDING 5G: PERSPECTIVES ON FUTURE TECHNOLOGICAL ADVANCEMENTS IN MOBILE (2014), *available at* <https://www.gsmainelligence.com/research/?file=141208-5g.pdf>.

<sup>13</sup> Jim Kohlenberger, *Mobilizing America: Accelerating Next Generation Wireless Opportunities Everywhere* (Sept. 2015), *available at* <http://mobilefuture.org/wp-content/uploads/2015/09/5G-Paper-1.pdf>.

<sup>14</sup> *Federal Communications Commission and National Association of Telecommunications Officers and Advisors Announce Workshop on DAS/Small Cell Deployment*, Public Notice, DA 16-315 (March 2016); *see also* <https://www.fcc.gov/files/21arnold-kimv03pdf>.

deployment, which is essential for the development of 5G networks that will support enhanced mHealth and healthIT services.

### **III. CONCLUSION**

Wireless infrastructure providers continue to invest billions of dollars to provide reliable wireless broadband and technology capable of handling mHealth and healthIT services. The Commission should build on the significant strides it has made towards eliminating barriers to infrastructure deployment and continue to pursue regulatory reform efforts as set forth above.

Respectfully submitted,

/s/ D. Zachary Champ  
D. Zachary Champ  
Director, Government Affairs

D. Van Fleet Bloys  
Senior Government Affairs Counsel

Sade Oshinubi  
Government Affairs Counsel

**Wireless Infrastructure Association**  
500 Montgomery Street, Suite 500  
Alexandria, VA 22314  
(703) 739-0300

June 08, 2017